



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 17 2003

REPLY TO THE ATTENTION OF:

B-19J

Mr. Bob Hennes, District Ranger
USDA Forest Service, Medford/Park Falls RD
850 N. 8th Street
Medford, Wisconsin 54451
Attn: Hoffman-Sailor West DEIS

Re: Comments on the Draft Environmental Impact Statement (EIS) for the Hoffman-Sailor West Project Within the Medford/Park Falls Ranger District, Chequamegon-Nicolet National Forest, Price County, Wisconsin, EIS No. 030040

Dear Mr. Hennes:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for the Hoffman-Sailor West Project Within the Medford/Park Falls Ranger District, Chequamegon-Nicolet National Forest. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act (CAA).

The need for the project stems from the differences between the existing and desired condition of the project area. The Record of Decision for the 1986 Chequamegon National Forest Land and Resource Management Plan assigned the project area a management prescription. This primary vegetation management emphasis for this prescription is to produce aspen pulpwood through even-aged management and to emphasize habitat for wildlife species associated with pioneer vegetation.

The proposed project addresses seven specific elements identified as needs for the area:

- ◆ maintain aspen pulpwood production
- ◆ enhance forest vegetation composition and structure
- ◆ enhance and maintain early successional habitat for wildlife species
- ◆ enhance watershed and fisheries quality

comments recommended that the Forest Service evaluate the effect of the primary vegetation management emphasis (produce aspen pulpwood through even-aged management) on broader forest health issues, e.g. forest tent caterpillars, beavers, and white-tailed deer and their impact on forest vegetation. Our interest stems from our concern for overall forest ecosystem health and how this project fits into the larger forest ecosystem. Information related to many of our concerns was presented throughout the Draft EIS. We would like to see more discussion on how the vegetation management emphasis on aspen may contribute to significant overpopulation of species that may affect overall forest health both in this project area and within the forest system.

We acknowledge that our comments are difficult to address within the context of any specific project level activity since they deal with broader ecological forest issues. However, we do think these issues should be dealt with within the Final EIS, perhaps within the context of the cumulative impact analysis for this project. We note that the cumulative impact analysis in this EIS does a good job at looking at past, present, and future actions (the temporal scope) but it does a less rigorous job of looking at impacts that extend beyond this project's spatial boundaries. Therefore, we recommend that the Forest Service evaluate how the aspen propagation strategy fits into the management of areas adjacent to the Hoffman-Sailor West project area, including any roadless or wilderness areas that occur in the same watershed.

U.S. EPA has rated the Draft EIS has an "EC-2." Our comments stated above regarding the relationship between this project and overall forest health issues are the basis for this rating. The rating is described in the attached Summary of Rating Definitions and Follow Up Action sheet. If you have any questions about our concerns, please call Sherry Kamke of my staff at (312) 353-5794 or send email to kamke.sherry@epa.gov. We look forward to working with you to resolve these comments.

Sincerely,



Kenneth A. Westlake
Chief, Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS state, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made